

QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

Frederick A. Lorig (Bar No. 057645)
fredericklorig@quinnemanuel.com
Steven M. Anderson (Bar No. 144014)
stevenanderson@quinnemanuel.com
Anthony P. Alden (Bar No. 232220)
anthonyalden@quinnemanuel.com
Joseph M. Paunovich (Bar No. 228222)
joepaunovich@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Attorneys for Plaintiff and Counter-Defendant
Teledyne Technologies Incorporated

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

TELEDYNE TECHNOLOGIES
INCORPORATED, a Delaware
corporation,

Plaintiff,

vs.

HONEYWELL INTERNATIONAL,
INC., a Delaware corporation,

Defendant.

AND COUNTERCLAIM

CASE NO. 06-06803-MMM (SHx)

The Honorable Margaret M. Morrow

DECLARATION OF DR. R. W.
KREUTEL IN SUPPORT OF
TELEDYNE'S SUPPLEMENTAL
MARKMAN BRIEF

Trial Date: Sept. 23, 2008
Discovery Cut-off Date: June 6, 2008
Pre-trial Conference Date: Aug. 25, 2008

1 telephone circuit and a SATCOM earth station in order to provide pay-per-view or
2 TV-on-demand services.

3 4. Inherent in the broadband TV broadcasting capability of DBS is
4 the means to provide Internet services with the aforementioned return link serving as
5 the information request link.

6 5. A Direct Broadcast Satellite provides point-to-multi-point
7 service. Broadband video and/or data (e.g., many TV channels or e-mails) are
8 transmitted simultaneously to many users (subscribers). The users are distributed
9 over a broad area of coverage, e.g., a country or a time zone within a country. By
10 means of an appropriate selection device, the receiver chooses or filters that part of
11 the transmission designated for the particular subscriber. For example, as stated
12 earlier, DBS can provide Internet services in which case subscribers can, with
13 appropriate user IDs and passwords, access private email accounts, bank accounts,
14 or the like.

15 6. In the 1970s, a joint venture was established between COMSAT
16 and the European Space Agency to develop a dedicated Aeronautical Satellite
17 system. Such a dedicated system was never developed due to technical and
18 operational difficulties and lack of financial support..

19 7. The International Maritime Satellite Organization (INMARSAT)
20 was formed in 1979 to provide mobile satellite service to seagoing platforms. The
21 INMARSAT charter was subsequently broadened to include both Aeronautical
22 Satellite and Land Mobile Services. The name of the INMARSAT organization was
23 changed to International Mobile Satellite Organization to reflect the broadened
24 scope of business, but the INMARSAT acronym was maintained. Aeronautical
25 Satellite services were introduced in the INMARSAT system in 1992.

1 8. Aeronautical Satellite services consist of two-way air-to-ground
2 and air-to-air telecommunications services for the crew and the passengers of
3 airplanes.

4 9. In the 1998-99 timeframe, reference to an "Aeronautical
5 Satellite" explicitly refers to an INMARSAT satellite, because INMARSAT was the
6 only satellite provider authorized by regulatory authority to provide Aeronautical
7 Satellite services.

8 10. In the 1998-99 timeframe, within the accepted nomenclature of
9 the satellite communication business, an "Aeronautical Satellite" would not be
10 considered a "Direct Broadcast Satellite." Nor would a "Direct Broadcast Satellite"
11 be considered a subspecies of an "Aeronautical Satellite." In this time period,
12 "Aeronautical Satellites" and "Direct Broadcast Satellites" were considered distinct
13 and separate types of satellite systems.

14 11. The following references support the facts in this Declaration:


15 11.1 Bruno Pattan, Satellite Systems: Principles and Technologies, pp.
16 218-225 (1993). A true and correct copy of relevant excerpts from this publication
17 is attached as Exhibit B.

18 11.2 Minutes of Meeting between NASA/NSF and INMARSAT (June
19 23, 1992). A true and correct copy of these minutes is attached as Exhibit C.

20 11.3 COMSAT Technical Review, vol. 11, no. 1, p. 195 (Fall 1981)
21 (special issue covering COMSAT's Direct Broadcast Satellite System). A true and
22 correct copy of relevant excerpts from this publication is attached as Exhibit D.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed this 11th day of February, 2008, at Los Angeles, California.

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6 _____
7 Dr. R. W. Kreutel